

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

STATE OF MISSOURI, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States,
et al.,

Defendants.

Case No. 4:24-cv-520-JAR

NOTICE OF COMPLIANCE

Defendants respectfully submit this Notice of Compliance to inform Plaintiffs and the Court of actions taken and anticipated to comply with the Court's June 24, 2024 Preliminary Injunction (ECF No. 36). The preliminary injunction prohibits Defendants "from any further loan forgiveness for borrowers under the Final Rule's SAVE plan until such time as this Court can decide the case on the merits." *Id.* at 1. Upon receipt of the preliminary injunction and in compliance with it, Defendants immediately ceased processing any additional loan forgiveness for borrowers enrolled in SAVE on the shortened timelines provided for in the Final Rule. For the duration of the injunction's effect, Defendants will not grant any loan forgiveness under the shortened timelines provided for in the Final Rule. Defendants do not understand the injunction to apply, in contrast, to the Department's preexisting programs that were not challenged in this lawsuit, including other income-contingent repayment plans (*i.e.*, REPAYE) that authorize loan forgiveness after 20 or 25 years of payments.

Dated: June 28, 2024

Respectfully submitted,

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/s/ Stephen M. Pezzi

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